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Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re

LESLIE KLEIN,

Debtor.

DAVID BERGER,

Plaintiff,

v.

LESLIE KLEIN,

Defendant.

Case No. 2:23-bk-10990-SK

Chapter 11

Adv. No. 2:23-ap-01169-SK

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT**

Present Status Conference Date:

Date: September 6, 2023

Time: 9:00 a.m.

Place: Courtroom 1575

This Stipulation to Extend Time to Respond to Complaint is entered into by Plaintiff, David Berger (the "**Plaintiff**"), and Defendant, Leslie Klein ("**Klein**" or "**Defendant**", and together with Plaintiff, the "**Parties**"), through their respective attorneys, with reference to the following facts:

A. On June 9, 2023, Plaintiff David Berger filed the Complaint for Nondischargeability of

1 Debt Pursuant to 11 USC § 523(a)(2)(a), 11 USC § 523(a)(4), & 11 USC § 523(a)(6); & for
2 Denial of Discharge Pursuant to 11 USC § 727(a)(2)(a); 11 USC § 727(a)(2)(b); 11 USC §
3 727(a)(3); 11 USC § 727(a)(4); 11 USC § 727(a)(5) (“**Complaint**”) against the Defendant Leslie
4 Klein [Doc #1].

5 B. On June 9, 2023, the Court’s Summons & Notice of Status Conference (“**Summons**”)
6 [Doc #3] set June 12, 2023 as the Defendant’s deadline to respond to the Complaint, and a status
7 conference on the matter for August 9, 2023 at 9:00 a.m. (the “**Status Conference**”).

8 C. On July 7, 2023, the Court’s issued another Summons & Notice of Status Conference
9 (“**Summons**”) [Doc #10], and set August 7, 2023 as the Defendant’s deadline to respond to the
10 Complaint, and a status conference on the matter for September 6, 2023 at 9:00 a.m. (the “**Status**
11 **Conference**”).

12 D. On July 7, 2023, Klein’s then counsel Eric Olson (“**Olson**”), who had just been recently on
13 May 23, 2023, substituted in as counsel for Klein (Doc #150) requested a extension to respond to
14 the Complaint, and represented that the Defendant needed time to retain experienced bankruptcy
15 counsel for the adversary proceeding.

16 E. In connection with the Complaint, the Plaintiff is satisfied that the Defendant has hired
17 experienced competent bankruptcy counsel (Michael Kogan of the Kogan Law Firm, APC – who
18 has substituted in on July 24, 2023) who is familiar with both the issues in this adversary
19 proceeding, and the rules and procedures of this Court, to enable the adversary proceeding to
20 proceed in a normal manner.

21 A. The Parties have agreed to continue the time to respond to the Complaint to August 22,
22 2023.

23 **WHEREFORE**, it is hereby stipulated by the Parties, through their respective attorneys,
24 as follows:

- 25 1. Defendant’s time to respond to the Complaint shall be extended to and including
26 August 22, 2023.
27
28

1 DATED: July 24, 2023

KOGAN LAW FIRM, APC
Michael S. Kogan

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4 By: /s/ Michael S. Kogan
Michael S. Kogan
5 Attorneys for Defendant

6 DATED: July 24, 2023

LAW OFFICES OF BARUCH C. COHEN
Baruch C. Cohen

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8 By: Baruch Cohen /authorized msk
9 Baruch C. Cohen
10 Attorneys for Plaintiff
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In re: LESLIE KLEIN

Debtor(s).

David Berger v Leslie Klein

CHAPTER: 11

CASE NUMBER: 2:23-bk-10990-SK

Adv. No. 2:23-ap-01169-SK

NOTE: When using this form to indicate service of a proposed order, **DO NOT** list any person or entity in Category I. Proposed orders do not generate an NEF because only orders that have been entered are placed on the CM/ECF docket.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 11500 W. Olympic Blvd., Suite 400, Los Angeles, California 90064

A true and correct copy of the foregoing document described as **STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") – Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On **July 24, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

☒ Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served): On **July 24, 2023**, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____ I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

July 24, 2023

Date

Pamela Lynn

Type Name

/s/Pamela Lynn

Signature

In re: LESLIE KLEIN Debtor(s). David Berger v Leslie Klein	CHAPTER: 11 CASE NUMBER: 2:23-bk-10990-SK Adv. No. 2:23-ap-01169-SK
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ADDITIONAL SERVICE INFORMATION (if needed):

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")

Baruch C Cohen (PL) bcc@BaruchCohenEsq.com, paralegal@baruchcohenesq.com
Michael I. Gottfried (IP) mgottfried@elkinskalt.com, cavila@elkinskalt.com,
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ustpreion16.la.ecf@usdoj.gov
• Clarisse Young youngshumaker@smcounsel.com, levern@smcounsel.com

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL - VIA U.S. MAIL

Hon. Sandra Klein
U.S. Bankruptcy Court
255 E. Temple St. #1582
Los Angeles, CA 90012